

## SDTF Comments on Sensitive Areas and BMP Labeling

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## Possible substitute language, SDTF

- Do not allow off-target *drift to* contact people, *pets, picnic sites or* areas where children play. *Application must prevent environmental or economic damage[injury] (adverse effect)* to nature preserves, wildlife refuges, public parks, aquatic water bodies and ecologically significant defined sites.

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## Definition of Sensitive Areas

- Human Exposure: Areas Frequented By Humans
- Nature Preserves, Wildlife Refuges, Parks, Lakes, Reservoirs, Rivers, Streams, Non-irrigation Canals, Natural Ponds, Estuaries, Wetlands, Intertidal Areas, Ecologically Significant Grasslands and defined sites

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## SDTF Recommendations for Label Language and Buffers (no spray zone)

- Mission: Reduce Drift Issues
  - What: Minimize environmental and economic impact from drift
  - When: Every spray application
  - Who: Applicator (CPA) has a responsibility to select an application scenario that minimizes drift at the application site or wait until conditions allow
  - Where: Around clearly -defined sensitive areas
  - How: Label language, buffers, BMP's, training

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## SDTF Recommended Label Language

- Simple, clear, concise label language based on best available science
- Reference a BMP (good practices) document
  - Tells applicator where to find information on how to minimize drift (e.g. USDA & state guidelines)
- Applicator responsibility
  - “Minimizing spray drift at the application site is the responsibility of the applicator”
- Enforceable and feasible
  - “Do not allow this product to contact unprotected humans. Minimize drift to sensitive areas. If adverse environmental or economic effects occur, enforcement action may be taken”

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## SDTF Recommended Label Language

(cont.)

- Clear and practical definition of sensitive areas in need of protection
- Downwind buffers only
  - SDTF Data confirm no need for upwind buffers
  - Avoid application when air is still (light & variable winds small buffer in all direction)
- Uniform rollout of label language across all products simultaneously
  - Avoids confusion, facilitates education
  - Prevents unfair competitive situations in market

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## SDTF Recommended Label Language (cont.)

- SDTF Proposed Sensitive areas
  - **Vertebrates**: wildlife conservation areas, important nesting and feeding habitats
  - **Terrestrial Plants**: nature preserves, wildlife refuges (Areas where non crop herbicides generally can not be applied)
  - **Aquatic**: lakes, reservoirs, rivers, permanent streams, marshes, natural ponds, estuaries, tidal basins and commercial fish ponds

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## SDTF Recommended Label Language (cont.)

- Sensitive areas (cont.)
  - **Endangered species habitat**: Follow directions in county bulletins; avoid conflict with county bulletins
  - **Areas occupied by humans**: schools, residential areas, playgrounds, athletic fields, picnic areas
- Non target crops -
  - Generally no buffers, special cases
  - Allow applicator discretion

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## Vegetative Canopy Filtration

- Multiple Governmental studies have been published stating 50-90% drift reduction with minimal (50% porosity, one row) hedge/tree row canopy downwind
- SDTF orchard data confirms significant one row effect of foliated trees

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## Spray Drift Buffers on Labels

- AgDRIFT® model predicts deposition
  - Co-operatively developed by CRADA - EPA, SDTF, USDA + US Forest Service, PMRA  
Based on SDTF database
  - Reasonable Worst-case scenarios
    - no vegetative filters downwind
    - high wind speeds constantly blowing toward sensitive area
  - Designed to predict very -conservative estimates of drift exposure

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